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10 *Attorneys for Fire Victim Trustee*

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

13 In re:
14 **PG&E CORPORATION,**

15 -and-

16
17 **PACIFIC GAS AND ELECTRIC**
18 **COMPANY,**

19 **Debtors.**

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

DECLARATION OF CATHY
YANNI IN SUPPORT OF
SUBMISSION OF TRUSTEE
DETERMINATIONS UNDER SEAL

[No Hearing Requested]

- 20 ☐ Affects PG&E Corporation
21 ☐ Affects Pacific Gas and Electric Company
22 ☒ Affects both Debtors

23 ** All papers shall be filed in the Lead Case,*
24 *No. 19-30088 (DM).*

25 I, Cathy Yanni, hereby declare under penalty of perjury that the following is true to the best
26 of my knowledge, information, and belief:

27 1. I became Successor Trustee of the PG&E Fire Victim Trust (“**Trustee**”) on July 1,
28 2022, pursuant to Section 5.2(d) of the Fire Victim Trust Agreement [Docket No. 8750-1). I am

1 duly authorized to make this Declaration (the “**Declaration**”) on behalf of the PG&E Fire Victim
2 Trust (the “**Trust**,” and its beneficiaries, the “**Fire Victims**”). Unless otherwise stated in this
3 Declaration, I have knowledge of the facts set forth herein and, if called as a witness, I would testify
4 thereto.

5 2. I am an attorney at law licensed to practice law in the state of California. Prior to
6 becoming Trustee, I served as the Court-appointed Claims Administrator for the Trust under the
7 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19,*
8 *2020* [Docket No. 8048] and, prior to that, pursuant to this Court’s *Order Granting Application of*
9 *The Official Committee of Tort Claimants Pursuant to 11 U.S.C. Sections 1103 and 363 and Fed.*
10 *R. Bankr. P. 2014 and 5002 to Retain and Employ Cathy Yanni as Claims Administrator Nunc Pro*
11 *Tunc to January 13, 2020* dated April 14, 2020 [Docket No. 6759]. Before serving as the Claims
12 Administrator, I served as the Court-appointed Administrator of the Wildfire Assistance Program
13 pursuant to this Court’s *Supplemental Order (A) Approving Appointment of Administrator and*
14 *Establishing Guidelines for the Wildfire Assistance Program and (B) Granting Related Relief* dated
15 June 5, 2019 [Docket No. 2409].

16 3. I submit this Declaration in support of the filing of the Appeals Neutral and Trustee
17 Determinations (collectively, including the exhibits thereto, the “**Trustee Determinations**”) for
18 each of Julie Poincenot, Patrick Doolittle, Megan Van Mater Davidson and Paul Lore (collectively,
19 “**Movants**”) under seal in accordance with this Court’s directive [Jul. 30, 2024 Hr’g Tr. at 29:10-
20 17] during the July 30, 2024 hearing on the *Motion to Stay Proceedings Re Disputed Claims Under*
21 *the Fire Victim Trust Agreement* [Docket No. 14491].

22 4. I am generally knowledgeable and familiar with the day-to-day operations of the
23 Trust, including the Fire Victim Claims asserted by Movants and the Trust’s determination of such
24 Fire Victim Claims. I personally prepared the Trustee Determinations with my team, and I certify
25 that the Trustee Determinations filed contemporaneously herewith are true and accurate copies of
26 those documents as originally provided to Movants’ counsel. I am authorized to submit this
27 Declaration on behalf of the Trust.

28

5. The facts set forth in this Declaration are based upon my personal knowledge, my review of relevant documents, and information provided to me by the Trust's legal advisors. If called upon to testify, I would testify to the facts set forth in this Declaration.

6. I believe that the terms of the Fire Victim Trust Agreement and the Fire Victim Trust Claims Resolution Procedures ***require*** the Trust to keep confidential ***all*** submissions to the Trust by claimants in support of their Fire Victim Claims.

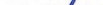
7. In addition, I note that the exhibits within the Trustee Determinations (the “**Exhibits**”), as originally provided to counsel for Movants, contain certain redactions. This was done as a matter of Trust policy in furtherance of the Trust’s obligation to keep confidential ***all*** submissions to the Trust by claimants in support of their Fire Victim Claims.

8. The Exhibits, which are internal Trust memoranda prepared by the Trust's Personal Injury Consultant, Eric Kennedy, Esq., for consideration by the Trustee, discuss the claims of ***all*** Movants. The same Exhibits were attached to each of the Trustee Determinations. As such, the Exhibits attached to each Movant's Trustee Determination redacted all personal information regarding any other Movant. For ease of review by the Court, the Trust is providing fully unredacted copies of the Exhibits separately. As all Movants share the same counsel, the Trust is also providing Movants' counsel with the same fully unredacted copies of the Exhibits.

9. For the foregoing reasons, I believe the sealing of the Trustee Determinations is warranted, as recognized by the Court during the July 30, 2024 hearing.

I declare under penalty of perjury, as set forth in 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 2nd day of August, 2024, in San Francisco, California.

By: 
Cathy Yanni, in her capacity as
Trustee of the PG&E Fire Victim Trust